

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

**FILED**

April 18, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASUnited States of America  
v.BY: M. Ramirez  
DEPUTY

Case No.

7:23-MJ-120

JUAN OLIVAS

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1 - April 14, 2023 in the county of Ector in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18 United States Code, § 933  
(a) and (b)

Conspiracy to Traffic Firearms

This criminal complaint is based on these facts:  
See the attached affidavit in support of criminal complaint.☒ Continued on the attached sheet.Attested to by applicant pursuant to Rule  
4.1 of Fed. R. Crim. P. by phone & email./s/ Blaise Dillenburg*Complainant's signature*Blaise Dillenburg FBI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 04/18/2023City and state: Midland, Texas*Judge's signature*U.S. Magistrate Judge Ronald C. Griffin*Printed name and title*

**AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE**

I, Blaise M. Dillenburg, Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, do hereby state as follows:

**INTRODUCTION**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since January 17, 2021. I am currently assigned to investigate transnational organized crime in the El Paso Field Office, Midland Resident Agency. As an FBI Special Agent, I am an investigative or law enforcement officer of the United States within Section 2510 (7) of Title 18, United States Codes, in that I am empowered by law to conduct investigations of various crimes which may arise from drug trafficking activities. Prior to my employment with the FBI, I was employed with the Temple Police Department, Temple, Texas, for approximately four years; and the Abilene Police Department, Abilene, Texas, for approximately three years as a licensed peace officer in the State of Texas. During my career in law enforcement, I have received training in and conducted investigations of alleged violations of the criminal laws of the State of Texas involving narcotics investigations and violent crime.

2. I make this affidavit in support of a criminal complaint charging Juan Olivas (herein referred to as "**OLIVAS**") with trafficking in firearms, in violation of Title 18, United States Code, Section 933(a)(1). Based on the facts cited in the body of this affidavit, I believe that probable cause exists that, on multiple occasions in 2023, in the Western District of Texas, the Northern District of Texas, and elsewhere **OLIVAS** did knowingly conspire and agree with persons known and unknown to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including, but not limited to six GLOCK firearms, to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

3. The sole purpose of this affidavit is to establish that there is probable cause to believe that **OLIVAS** engaged in specific criminal activity. The statements contained in this affidavit are based on familiar facts and circumstances of this investigation as a result of my personal participation in the investigation and information provided by FBI special agents, Ector County Sheriff's Office investigators, other law enforcement personnel, and written reports about this and other investigations

that I have received, directly or indirectly, from other law enforcement officers and my experience, training, and background as a special agent with the FBI.

4. The information set forth in this affidavit is provided in support of the attached Criminal Complaint, charging **OLIVAS** with violating Title 18, United States Code, Section 933(a) and (b) regarding trafficking of firearms, while in the Western District of Texas and elsewhere, and thus is intended only to establish probable cause to believe that those offenses were committed. As such, it does not include each fact known to law enforcement about this investigation.

### **FACTUAL BASIS OF COMPLAINT**

5. On April 12, 2023, after receiving information of drug trafficking activities at a residence located at 2600 West 46<sup>th</sup> Street, Unit 6, Odessa, Ector County, Texas an area located in the Western District of Texas ECSO investigators conducted a spot check near the residence when they observed a subject walk out of the residence with a black duffel bag and enter a red vehicle. ECSO observed the red vehicle driveway from the residence, and they began following when they observed the driver of the vehicle commit a traffic violation. After observing the traffic violation, ECSO investigators conducted a traffic stop and contacted a subject who was the sole occupant of the vehicle. During the investigative traffic stop ECSO investigators obtained consent to search the vehicle and during the consensual search they located a black duffel bag placed in the back passenger seat of the vehicle. ECSO investigators opened the black duffel bag and observed that it contained six empty black plastic factory GLOCK handgun boxes. ECSO investigators began questioning the subject reference the six empty GLOCK handgun boxes.

6. During the consensual interview after the Miranda warning was given, the subject agreed to speak with ECSO investigators and informed them he had dropped off six GLOCK handguns to an unknown male later identified Sergio ACOSTA at the residence located 2600 West 46th Street, Unit 6, Odessa, Texas. The subject stated that they purchased the GLOCK handguns at a gun show in Midland, Texas a few weeks ago with the intent of providing them to unidentified subjects who will then transport those firearms to unknown locations within Mexico. During the interview the subject further admitted they have contact via WhatsApp frequently with a subject in Mexico who coordinates the transfer and payment of the firearms after they are purchased in exchange of approximately one hundred dollars in United States currency per firearm. The subject then further admitted to ECSO investigators that they had done this on multiple occasions over the course of a few months and that they know the firearms are being transported illegally to Mexico.

7. On April 14, 2023, FBI special agents with the assistance of the Ector County Sherriff's Office, and Midland Police Department obtained and executed a federal search warrant at 2600 West 46<sup>th</sup> Street, Odessa, Ector County, Texas. During the search warrant, FBI special agents made contact with four subjects inside the residence including **OLIVAS**.

8. After the residence was deemed secure, FBI special agents and Ector County Sherriff's Office investigators searched the residence and recovered items including bulk United States currency, ammunition, empty firearm boxes, ledgers, firearms accessories, magazines, and a firearm, indicative of firearms trafficking. While FBI special agents finished processing the residence, an Ector County Sheriff's investigator and two FBI special agents began speaking with **OLIVAS** inside the residence. **OLIVAS** was read his Miranda warning in Spanish and after indicating he understood he agreed to speak with law enforcement personnel.

9. During the interview, **OLIVAS** informed ECSO investigators and FBI special agents that he served as transporter and facilitator by picking up firearms and arranging transportation of the firearms to Mexico. **OLIVAS** stated that on one occasion in early 2023 he traveled to Lubbock, Texas and met with a subject and picked up approximately 15 firearms. After picking up the firearms, **OLIVAS** then drove to Odessa, Texas with the firearms and moved the firearms under the spare tire of his vehicle. **OLIVAS** stated that he then drove the vehicle by himself to Chihuahua, Chihuahua Mexico via Presidio TX port of entry.

10. **OLIVAS** further stated that on Wednesday, April 12, 2023, he and another individual received multiple GLOCK firearms. **OLIVAS** stated that later that night or in the early morning hours of the next day he transferred the GLOCK firearms to a third individual at the direction of another individual in Mexico.

11. GLOCK firearms are manufactured in the State of Georgia or the country of Austria. Therefore, the firearms **OLIVAS** transferred on Wednesday, April 12, 2023 were manufactured outside the State of Texas and thus traveled in at least interstate commerce prior to being transferred by **OLIVAS** to another individual knowing the firearms were intended to travel to Mexico.

12. Based on the facts cited above, I believed that probable cause exists that Juan **OLIVAS** did on multiple occasions in 2023, in the Western District of Texas, the Northern District of Texas, and elsewhere **OLIVAS** did knowingly conspire and agree with persons known and unknown to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including, but not limited to six GLOCK firearms, to another person, in and affecting interstate and foreign

commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

13. The punishment, **OLIVAS** faces, if convicted shall be an imprisonment not more than fifteen years, a term of supervised release not to exceed three years; maximum fine of up to \$250,000; and a \$100 special assessment.

14. Assistant United States Attorney (AUSA) Brandi Young was notified and agreed to prosecute the case federally in the Western District of Texas.

/s/ Blaise Dillenburg

Blaise Dillenburg  
Special Agent  
Federal Bureau of Investigation (FBI)

Attested to by applicant pursuant to Rule  
4.1 of Fed. R. Crim. P. by phone & email.

Sworn and Subscribed before me this 18th day of April, 2023.



United States Magistrate Judge  
Ronald C. Griffin